



City of Seattle
Seattle Public Utilities

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FCC Mail Room

June 21, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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RE: Response to RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz band for Terrestrial Mobile Use Shared With Federal Use

Dear Secretary Dortch:

Seattle Public Utilities (SPU) supplies water to approximately 1.4 million people in the Seattle area from two large regional watersheds, the Cedar River and South Fork Tolt River. The utility operates and maintains large mountain reservoirs and multiple dams in these watersheds.

I urge the your agency not to move forward with the proposed rulemaking to allocate the 1675-1680 MHz band for Terrestrial Mobile Use Shared With Federal Use unless adequate protection zones are extended to USGS-related sites. Such protection is crucial to avoid the disruption of vital information used to ensure that the nation's economic health and national safety and security interests are safeguarded. Without significant research customized to our industry, we are not confident disruptive interference can be avoided and we will continue to oppose this effort for spectrum sharing.

The Cedar River system is operated under the provisions of the 50-year Cedar River Watershed Habitat Conservation Plan adopted in 2000, including the Instream Flow Agreement. The South Fork Tolt system is operated under the 1988 South Fork Tolt River Hydroelectric Project Settlement Agreement, which was executed as part of the Federal Energy Regulatory Commission (FERC) licensing process. The FERC license established instream flow requirements that must be met when operating the system.

Seattle Public Utilities has significant concerns regarding the Federal Communication Commission's plan to share 1675-1680 Megahertz radio spectrum between a new terrestrial broadband wireless provider venture and long established government hydrological data providers.

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Real time flow and reservoir height data are critical for maintaining compliance with FERC licenses. In particular maintaining our storage reservoirs at levels that allow for flood protection during storm and rapid snowmelt events is impossible without these data. For fisheries protection we rely on real-time stream gauge reading to comply with down ramping rate requirements, minimum instream flows, and managing spill. Complying with regulatory and legal agreements provides critical protections to Endangered Species Act-listed fishes throughout the freshwater portions of their life cycles. Most of our facilities require instantaneous real-time telemetered data as part of the operation. These operations are time sensitive. Any disruption of telemetered data streams will put us at risk of injuring or killing these ESA-listed fish species at multiple life stages. *Without reliable signal transmission and reception to and from the GOES Data Collection System, the USGS hydrological data collection and distribution system would not function reliably to provide this essential information.*

I understand simple filtering is no longer an option to mitigate the interference of a strong commercial transmitter using the same frequency as the DCS satellite downlink signal. Engineers indicate the signal strength of the proposed terrestrial commercial transmitter is over a million times stronger than a DCS downlink to an earth system station, which can cause DCS receiver electronics to function improperly. Such a clear risk of significant interference to DCS users, who range across multiple areas of the economy and public safety functions, in addition to our flood and hydrologic warning industry, is simply not acceptable.

Reliable, accurate, and timely data is imperative for our daily, hourly and minute to minute operations of our water supply facilities. Anything less than real-time information transmitted via the GOES and GOES-R satellites using this spectrum will threaten these important environmental, public safety and/or economic activities.

Thank you for considering my input.

Sincerely,



Ray Hoffman, Director
Seattle Public Utilities